

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

TOMMY ROBINSON,	:	
	:	
Plaintiff,	:	
	:	Case No. C-1-02-441
v.	:	Judge Beckwith
	:	Magistrate Judge Hogan
TALBERT HOUSE, et al.,	:	
	:	
Defendants.	:	

AFFIDAVIT OF SCOTT MCVEY

STATE OF OHIO :
: ss:
COUNTY OF HAMILTON :

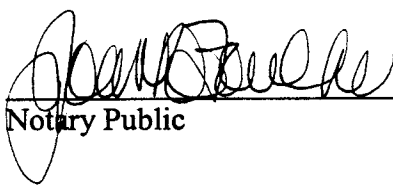
SCOTT McVEY, being duly sworn deposes and states as follows"

1. At the time of Tommy Robinson's termination from employment at Talbert House, I was the Operations Manager at the Community Correctional Center for Talbert House.
2. Tommy Robinson was employed at the Beekman Facility which is an all male client facility that provides a variety of treatment programs for men 18 years and older who have been convicted of a misdemeanor or low level felony by Hamilton County Courts.
3. Tommy Robinson was employed in a close supervision capacity which is a six month period of probationary status for all newly hired employees.
4. While Robinson was employed at the Beekman Facility 75 % of security monitors were male and 50 % were age 40 or over. The ages ranged from 24 to 74. Security monitors are often requested to observe urine drug screen which requires a staff member and this is the reason that 75 % of the monitors were male.

4. Tommy Robinson was terminated on August 24, 2001 due to several performance problems which arose during his close supervision status. The problems are set forth in the notice of termination. This notice states that Tommy Robinson removed Talbert House food items from the facility. While Talbert House provides snacks at times for its clientele and its employees, it does not permit employees to remove food items from the facility to take home.


SCOTT McVEY

Sworn to and subscribed before me this 30th day of April, 2003


Notary Public

JOAN H. FOULKE
Notary Public, State of Ohio
My Commission Expires Mar. 11, 2008